

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON**

  
JOSEPH R. GOODWIN  
UNITED STATES DISTRICT JUDGE

<b>IN RE ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION</b>	<b>Master File No. 2:12-MD-02327 MDL 2327</b>  <b>JOSEPH R. GOODWIN U.S. DISTRICT JUDGE</b>
<b>THIS DOCUMENT RELATES TO:  WAVE 2 CASES</b>	

**DEFENDANTS' MOTION TO EXCEED PAGE LIMITATION**

Defendants Ethicon, Inc. and Johnson & Johnson respectfully request that the Court afford them leave to exceed the 20-page limitation set forth in Local Rule 7.1(a)(2), as it relates to their forthcoming response in opposition to Plaintiffs' motion to exclude the general expert opinions of Dr. Shelby F. Thames, Ph.D. As support for this motion, Defendants submit that there are many aspects of Plaintiffs' motion that require a detailed response.

Dr. Thames is a polymer scientist who has been disclosed as an expert for Ethicon in numerous Wave 2 cases. His opinions deal with complex scientific and technical questions, and address issues raised by Plaintiffs' materials scientists and pathologists. Defendants submit that many of Plaintiffs' assertions regarding Dr. Thames's opinions require a detailed response. Defendants further submit that the Court will benefit from a comprehensive assessment of the science underlying Dr. Thames's opinions.

For all of these reasons, Defendants submit that they have presented good cause for relief from the page limitation requirements, and respectfully request that the Court allow them to present a 25-page brief responding to Plaintiffs' motion to exclude Dr. Thames's opinions.

Respectfully submitted,

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